

J. SCOTT MOEDE, OSB 934816
Chief Deputy City Attorney
scott.moede@portlandoregon.gov
NAOMI SHEFFIELD, OSB 170601
Deputy City Attorney
naomi.sheffield@portlandoregon.gov
ROBERT YAMACHIKA, OSB 065560
Senior Deputy City Attorney
rob.yamachika@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Of Attorneys for Defendant City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated, ALEXANDRA JOHNSON, in an individual capacity and on behalf of themselves and all others similarly situated,

PLAINTIFFS,

v.

CITY OF PORTLAND, a municipal corporation, and MULTNOMAH COUNTY, a political subdivision of the State,

DEFENDANTS.

3:20-cv-00917-HZ

DECLARATION OF NAOMI SHEFFIELD

(In Support of Defendant City of Portland's Response to Plaintiffs' Motion for Preliminary Injunction)

I, Naomi Sheffield, Deputy City Attorney representing defendant City of Portland in the above-entitled matter, declare as follows:

1. The following is a link to a tweet from @PortlandPolice at 11:03 pm on May 29, 2020: <http://twitter.com/PortlandPolice/status/1266611192350400513>
2. The following is a link to a tweet from @PortlandPolice at 11:49 pm on May 29, 2020: <http://twitter.com/PortlandPolice/status/1266622765903122432>
3. The following is a link to a tweet from @PortlandPolice at 12:05 am on May 30, 2020: <http://twitter.com/PortlandPolice/status/1266626741176418304>
4. The following is a link to a tweet from @PortlandPolice at 12:05 am on May 30, 2020: <http://twitter.com/PortlandPolice/status/1266636110387572737>
5. The following is a link to a tweet from @PortlandPolice at 7:40 pm on May 30, 2020: <http://twitter.com/PortlandPolice/status/1266923015159181312>
6. The following is a link to a tweet from @PortlandPolice at 7:14 pm on May 30, 2020: <http://twitter.com/PortlandPolice/status/1266915855096360962>
7. The following is a link to a tweet from @MrOlmos at 7:07 pm on May 30, 2020: <https://twitter.com/MrOlmos/status/1266914152867524609>
8. The following is a link to a tweet from @PortlandPolice at 8:00 pm on May 30, 2020: <http://twitter.com/PortlandPolice/status/1266927762842898437>
9. The following is a link to a video showing protestors asking officers to take a knee, and the officers doing so, at 2:20 pm on May 31, 2020: https://www.youtube.com/watch?v=8WFqP_Yb3yI
10. The following is a link to a tweet from @PortlandPolice at 5:19 pm on May 31, 2020: <http://twitter.com/PortlandPolice/status/1267249406891274240>
11. The following is a link to a tweet from @PortlandPolice at 6:55 pm on May 31, 2020: <http://twitter.com/PortlandPolice/status/1267274356880596993>
12. The following is a link to a tweet from @PortlandPolice at 7:07 pm on May 31, 2020: <http://twitter.com/PortlandPolice/status/1267276506855731200>

13. The following is a link to a tweet from @PortlandPolice at 8:41 pm on May 31, 2020: <http://twitter.com/PortlandPolice/status/1267300212734693378>
14. The following is a link to a tweet from @PortlandPolice at 9:39 pm on May 31, 2020: <http://twitter.com/PortlandPolice/status/1267314904664399872>
15. The following is a link to a tweet from @PortlandPolice at 10:48 pm on May 31, 2020: <http://twitter.com/PortlandPolice/status/1267332073007640578>
16. The following is a link to a tweet from @PortlandPolice at 11:29 pm on May 31, 2020: <http://twitter.com/PortlandPolice/status/1267342493961482241>
17. The following is a link to a tweet from @PDXzane at 1:10 am on June 1, 2020: <https://twitter.com/PDXzane/status/1267352780487847937>
18. The following is a link to a tweet from @PDXzane at 1:20 am on June 1, 2020: <https://twitter.com/PDXzane/status/1267355227964837889>
19. The following is a link to a tweet from @MrOlmos at 1:24 am on June 1, 2020: <https://twitter.com/MrOlmos/status/1267356343213584385>
20. The following is a link to a tweet from @PortlandPolice at 9:05 pm on June 2, 2020: <http://twitter.com/PortlandPolice/status/1268030988568817664>
21. The following is a link to a tweet from @PortlandPolice at 9:33 pm on June 2, 2020: <http://twitter.com/PortlandPolice/status/1268038134811389952>
22. The following is a link to a tweet from @dirquez at 11:32 pm on June 2, 2020: <https://twitter.com/dirquez/status/1268067956858077186>
23. The following is a link to a tweet from @MrOlmos at 11:45 pm on June 2, 2020: <https://twitter.com/MrOlmos/status/1268071335567056896>
24. The following is a link to a tweet from @Portland Police at 12:12 am on July 5, 2020: <https://twitter.com/PortlandPolice/status/1279674601010630657>
25. Attached as [Exhibit 44](#) is the Defendant City of Portland's proposed injunctive language should the Court grant Plaintiffs' Motion.

26. Attached as **Exhibits 45-51** are videos showing some of the activity that has taken place over the past 38 days:

- a. [Exhibit 45](#) – June 7, Video taken by PPB of projectiles being thrown at police.
- b. [Exhibit 46](#) – June 8, Video taken by PPB of projectiles being thrown at an officer.
- c. [Exhibit 47](#) – June 11, Livestream and Twitter Video of protesters blocking a PPB car garage with a barricade and launching projectiles (including fireworks) at officers.
- d. [Exhibit 48](#) – June 12, Livestream Video of protesters taking down the fence around the federal courthouse and launching projectiles at officers.
- e. [Exhibit 49](#) – June 14, Video of protesters launching fireworks at officers while they attempt to make an arrest of someone inside the fenced off area.
- f. [Exhibit 50](#) – June 29, Livestream video of protesters kicking out and pulling down plywood off the Justice Center and breaking in the windows.
- g. [Exhibit 51](#) – July 1, Video of protesters setting fires in the street and firing fireworks at the Justice Center.

27. Attached is an [Index](#) to the video sources for Exhibits 45-51.

28. I make this declaration in support of Defendant City of Portland's Response to Plaintiff's Motion for Preliminary Injunction

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: July 6, 2020.

/s/ Naomi Sheffield
Naomi Sheffield